

Foodborne Illnesses in America

Complex Factory Foods pose the Highest Risk

By [Rady Ananda](#)

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A close look at the people behind the raw milk scare, and the actual numbers of foodborne illness, reveals that politics more than science drives the food safety agenda in the U.S.

Agriculture Secretary Tom Vilsack just appointed Susan Vaughn Grooters to the National Advisory Committee on Microbiological Criteria for Foods (NACMCF), which is also served by Dr. Wafa Birbari of junk food giant, Sara Lee Corp.

Lacking a PhD, Grooters will serve her two-year term on NACMCF as a “consumer representative.” She currently works with STOP Foodborne Illness (formerly Safe Tables Our Priority), an organization that condemns raw dairy and urges broad expansion of federal control over food.

Grooters hopes to federalize state reporting of contaminated food, as explained to Center for Science in the Public Interest:

“States’ systematic differences in response to foodborne illness case reporting may also explain variations in rates,” said S.T.O.P’s public health specialist, Susan Vaughn Grooters. “Time differences in surveying cases of foodborne illness and lack of integrated data collection may also affect how well states accurately capture data.” [1]

In a playful charade calling for stricter controls on food, she recently tweeted:

“Really??? Really? I would beg to differ Sec. Vilsack! ..unless of course you’re proposing a change to policies... ☐ <http://usat.ly/kceLEY>”

With these opinions, it’s almost a joke to say she represents consumers.

Though the Food Safety Modernization Act is characterized as promoting “science-based” food control driven by “risk-based” analysis, [2] instead, under FSMA authority, the FDA has claimed power to seize food without evidence of contamination. [3]

Evidence is the foundation of science and law; removal and destruction of evidence is anti-science and fraudulent. (See Victor Rawls’ well-argued essay on this. [4])

Contrary to “risk-based” control, the FDA continues to seize and destroy food that sickened no one, while knowingly allowing tainted meat on the market and doing nothing about it until someone died, as in Cargill’s 36-million-pound turkey recall.

Seizing food without evidence of contamination also violates the Fourth Amendment.

RANKING FOODBORNE RISKS

Statistics tend to put people to sleep, but three important reports were published this year that deserve attention: one by the Centers for Disease Control (CDC), [5] one by the University of Florida (UF) to which Grooters contributed, [6] and one by retired pathologist and raw milk drinker, Dr. Ted Beals. [7]

Let's agree that numbers can be massaged to prove just about anything. However, when opponents of raw milk make outrageous claims about its dangers, and when millions of state and federal dollars are spent eliminating it as a food choice thru armed raids - **and yet their own statistics belie the stated risk** - we ought to shout that from the rooftop.

How Bad It Is(n't)

As the Director of Research and Education, Grooters is responsible for the STOP Foodborne Illness page, "Fact vs. Myth." As if unable to distinguish the two, SFI repeats unsubstantiated, fear mongering propaganda. We'll start with an easy one:

"There are no documented health benefits associated with ingestion of unpasteurized milk or milk products."

Quite the opposite is true. In 2006, researchers reported the "competitive exclusion" effect of good bacteria found in raw milk, observing that:

"Lactococcus lactis subsp. lactis C-1-92 and Enterococcus durans 152 ... are bactericidal to *Listeria monocytogenes* or inhibit the growth of *L. monocytogenes* both in vitro and in biofilms." [8]

Listeria monocytogenes is responsible for 1,591 illnesses a year, according to the 2011 CDC report (at Table 2). [5] That's for all foods, not just milk. Dr Beals described it this way:

"*Listeria monocytogenes* is the most serious and deadly of the contemporary foodborne pathogens. Yet it is also ubiquitous in our environment." [7]

Based on Dept of Health and Human Services (DHS) data covering 1999 thru 2010, Dr Beals determined, "there have been no cases attributed to drinking raw milk in the last twelve years." [7]

On the other hand, *Lactococcus lactis*, a probiotic bacterium found in raw milk of pastured cows, was legislated as Wisconsin's state microbe last year. Microbiology professor Kenneth Todar explains that Lactococci are associated with grasses, which pastured cows ingest, and which then show up in their milk. [9]

Not only are Lactococcus deadly to pathogenic bacteria, but they are vital to making certain cheeses and other fermented products. And, they have to be added back in when starting with pasteurized milk.

Grooters also advises that:

"Pregnant women, young children, the elderly and those with weakened

immune systems should avoid unpasteurized products.”

It's a wonder the human species survived 200,000 years before the food police came along! We know for certain that humans have been drinking unpasteurized animal milk for at least ten thousand years. [10] Human population certainly hasn't decreased since then.

The enzymes and “friendly” bacteria destroyed by pasteurization boost our immunity. We know this based on the scientifically accepted “competitive exclusion” principle – the more friendly bacteria you have, the fewer pathogenic ones that survive. Friendly bacteria compose part of our immune system, and competitive exclusion is what the entire probiotics food industry is based on.

Pasteurized Milk Contaminations

Grooters also stated at the Myths and Facts page:

“Raw or unpasteurized milk can transmit many serious infectious diseases to children.”

Then why doesn't it? Statistics from the UF report to which she contributed show dairy to be the safest of all foods, accounting for 1/100th of a percent of all foodborne illnesses annually. (More on this below.)

In fact, raw milk is much safer than pasteurized. According to Dr Beals, in 2010, DHS reported 90,771 confirmed foodborne illnesses for the period 1999 thru 2010. Based on DHS data, Beals reports you are 35,000 times more likely to get sick from any food other than raw milk. [7]

Beals calculated that 42 people become ill from contaminated raw milk each year, a figure which includes “both ‘confirmed’ and ‘presumed’ cases.”

Yet, in a single case of contaminated pasteurized milk, over 16,000 people became ill in Illinois and several other Midwest states. Later, up to 5 of them died. That 1985 calamity was called the “worst outbreak of Salmonella food poisoning in U.S. history.” [11] It even beats last year's half-billion egg recall with just over 1,900 confirmed cases of salmonella poisoning.

In a 1983 Massachusetts milk contamination case, 49 people became ill. Later, 14 of them died. An inspection found the pasteurization process up to snuff, leading scientists to question relying on pasteurization to kill listeria. [12]

70% of all foodborne illnesses come from factory foods; Dairy is safest of all food

Here is where a political agenda drives scientific reporting. The 2011 UF report [6] sought to determine which pathogens and which foods pose the highest risk. “Complex foods” (defined as non-meat factory foods with a host of additives) accounts for a whopping 70% of the 3,861,128 annual foodborne illnesses UF considered. (p.9)

Dairy, on the other hand, accounts for 434 illnesses. That's about 1/100th of a percent, “almost all” of it “due to soft-ripened cheeses” – mostly queso fresco, a soft cheese made from raw milk favored in the Hispanic community. (p.43)

UF developed a ranking system based on various factors including “quality of life,” a term

used by DHS. This is where numbers can be massaged to show an increased risk that wouldn't be obvious from raw numbers. This probably explains how UF ranked dairy risk #5 in a field of 10, despite that factory foods sickened 2,689,877 people and dairy sickened only 434.

Ignoring their qualitative factors and using just the UF numbers of illness and death for each food category, the following charts show which foods sicken or kill people the most:

Ranking the Risk of illness	% of illnesses	No. of illnesses	Ranking the Risk of Death	% of deaths	No. of deaths
Complex factory foods	70	2,689,877	Complex factory foods	18	140
Poultry	21	829,276	Poultry	18	136
Produce	4	170,264	Pork	18	134
Eggs	3	115,003	Deli Meats	14	104
Pork	0.92	35,537	Beef	10	76
Beef	0.54	20,086	Dairy	9	70
Deli Meats	0.017	651	Produce	8	63
Dairy	0.011	434	Eggs	5	42
Total:	100	3,861,128	Total:	100	765

From UF's own data, dairy is the safest food on the market, with the least number of illnesses - a number so small (1/100th of a percent of all foodborne illnesses) that it can be ignored when talking about risky food.

Of the 3.8 million incidents of foodborne illnesses UF considered, only 765 people died. That's one death per five thousand illnesses. You are more likely to die in a car crash - a risk most of us take every single day of our adult lives.

So, fully grasping the minute scale we're zooming in on now, of the eight food categories, dairy ranks #6 in risk of death. You're twice as likely to die from a foodborne illness traced to factory foods (18% of all deaths) than you are from dairy (9%).

Keep in mind that "almost all" of those dairy deaths are from soft-ripened cheese, not raw milk. Though made with raw milk, no one knows where in the cheesemaking process the cheese became contaminated. It could have occurred at any of several stages and have had nothing to do with the milk itself.

It takes a pretty strong imagination to justify ranking dairy the fifth riskiest food in the nation when it only accounts for 1/100th of a percent of all foodborne illnesses. But that's what UF did.

Given Grooters' fear mongering against raw dairy despite CDC evidence proving otherwise, she is not at all a surprising choice for Secretary Vilsack to have made. But it is rather disingenuous to characterize her as representing consumers, when, clearly, she represents corporate aims to shut down natural dairy.

If Obama truly wanted to develop a science-based food safety policy driven by risk-based analysis, raw dairies would be promoted rather than criminalized. Instead, what we see is support for factory-processed foods adulterated with genetically modified organisms, drugs, chemicals, nanomaterials, rat droppings, and wood [22] - all permitted by the FDA.

Rady Ananda specializes in Natural Resources and administers the sites, [Food Freedom](#) and [COTO Report](#). To obtain a full copy of this report, including Notes and Sources Used, [click here](#).

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